

**UNITED STATES DISTRICT COURT**

**WESTERN DISTRICT OF LOUISIANA**

**KENNETH PERRY**

**Versus**

**UNITED PROPERTY &  
CASUALTY INSURANCE  
CO.**

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**DOCKET NO. 6:22-cv-05232**

**JUDGE ROBERT R. SUMMERHAYS**

**MAGISTRATE CAROL B  
WHITEHURST**

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**MOTION TO ENROLL AND SUBSTITUTE COUNSEL OF RECORD**

**NOW INTO COURT**, through undersigned counsel, comes Plaintiff, KENNETH PERRY (hereinafter referred to as “Plaintiff”), who respectfully submits the following Motion to Enroll and Substitute as Counsel of Record as follows:

Plaintiff desires to withdraw Chinwe Onyenekwu as counsel of record and requests that this Honorable Court enter an order enrolling Attorney Mark Ladd on behalf of the Galindo Law Firm, in the above-captioned matter. Attorney Ladd is a member of the Louisiana State Bar, and whose membership with the United States District Court, Western District of Louisiana, is in good standing.

**WHEREFORE**, Plaintiff, KENNETH PERRY, prays that this Honorable Court grant Plaintiff's Motion to Enroll and Substitute as Counsel of Record, by withdrawing Chinwe Onyenekwu and enrolling Mark Ladd, for Plaintiff. Accordingly, Counsel further requests that upon granting of this Motion that all pleadings, papers, and other documents be served on Mark Ladd at the following e-mail address: [mark@galindolaw.com](mailto:mark@galindolaw.com)

Respectfully Submitted,



Chinwe Ndidi Onyenekwu

Louisiana Bar No. 34013

[chewa@galindolaw.com](mailto:chewa@galindolaw.com)

Galindo Law Firm

3850 North Causeway Blvd, Suite 1520

Metairie, LA 70002

Ph. 713-228-3030

Fax 713-228-3003

Email: [hurricane@galindolaw.com](mailto:hurricane@galindolaw.com)

And

/s/ Mark Ladd

Mark Ladd

Louisiana Bar Number: 30847

[mark@galindolaw.com](mailto:mark@galindolaw.com)

Galindo Law Firm

3850 North Causeway Blvd. Ste. 1520

Metairie, Louisiana 70002

Ph. 713-228-3030

Fax 713-228-3003

Email: [hurricane@galindolaw.com](mailto:hurricane@galindolaw.com)

**ATTORNEYS FOR THE PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that Plaintiff has been notified of all deadlines and pending court appearances, and the foregoing pleading has been delivered to Plaintiff via certified mail, and counsels of record, through the CM/ECF system, depositing a copy of same in the United States mail, first-class postage prepaid, by hand delivery, email, or by facsimile transmission, this December 22, 2023.

/s/ Chinwe Ndidi Onyenekwu  
CHINWE NDIDI ONYENEKWU